

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

AVRAHAM GOLDMAN, *et al.*,

*Plaintiffs,*

v.

LAFARGE S.A., *et al.*,

*Defendants.*

Civil No. 1:24-cv-01043-NGG-PK

HELEN JANE WILSON, *et al.*,

*Plaintiffs,*

v.

LAFARGE S.A., *et al.*,

*Defendants.*

Civil No. 1:25-cv-01975-NGG-PK

**[PROPOSED] ORDER GRANTING DEFENDANTS' COMBINED MOTION TO  
DISMISS PLAINTIFFS' PRIMARY LIABILITY CLAIMS**

Upon consideration of Defendants' Combined Motion to Dismiss Plaintiffs' Primary Liability Claims in their Complaints and all briefing, papers, and argument relating to the Motion, it is hereby ORDERED that pursuant to Fed. R. Civ. P. 12(b)(6):

1. Defendants' Motion is **GRANTED**;
2. Counts IV-VI of the *Wilson* Complaint (Dkt.1) are **DISMISSED** with prejudice; and
3. Counts I-III of the *Goldman* Complaint (Dkt.1) are **DISMISSED** with prejudice.

SO ORDERED this \_\_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_.

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HON. NICHOLAS G. GARAUFIS  
UNITED STATES DISTRICT JUDGE